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Your Seattle City Light

Memorandum

DATE : December 17, 1980

TO : Katherine Fletcher

FROM : Steve Ralph S/SR

SUBJECT : PCB Workshop, December 10, 1980, in Portland, Oregon (Sponsored by NWPPA)

Kathy, the PCB Workshop turned out to be quite informative. The overall impression I came away with is that utility folks are in a double bind on the issue of disposal of PCB-contaminated stuff. This is especially true in light of the recent D.C. Federal Court decision (Oct. 30) that "EPA's determination that it need not regulate PCB's in concentrations of less than 50 ppm is unsupportable and that the agency's designation of specific kinds of PCB uses 'totally enclosed' is inadequate."

Jim Everts, Chief of Toxic Stuff for Region X of EPA, was there to field questions. He stated that the situation will change as a result of the court finding, but he's not yet sure how and to what extent. Disposal of any PCB-contaminated stuff in concentrations greater than 50 ppm is quite a hassle and expensive.

Others from City Light were in attendance, one of whom participated in a panel discussion on utility concerns regarding PCB's. Herb Johnson, Senior Electrical Engineer with SCL, stated that Seattle has 70,000 transformers in the system, most of which have no label to indicate whether they are PCB-contaminated or not. To find out would cost at least $30/transformer. So, SCL assumes that they are indeed not PCB-contaminated. My understanding is that when the unit is retired or malfunctions (i.e., blows), they clean up as normal and put the oil from the unit into a storage tank. Not until the tank is full is a sample drawn for analysis. If it is less than 50 ppm of PCB, it may be disposed of fairly casually. If not, EPA clamps tight restrictions on its storage and disposal. At present, disposal of "hot" PCB-contaminated stuff costs about $68/gallon.

My concerns are twofold:

1. Crews cleaning up these malfunctioned unlabeled transformers may be exposed repeatedly to unknown levels of PCB-contaminated transformer oils and associated residues.
2. There may be a tendency to dilute known hot stuff with low-level PCB-contaminated oils to yield oil still below 50 ppm.

These concerns may be moot in light of the court decision referred to earlier.

SR:gm

cc: Willing, Yon, Edson, Lehman, Anderson, Kirkpatrick, OEA (2), Ralph

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